Remarks

Claims 2, 6, 7 and 10 have been amended to overcome the informalities cited. Claim 1 has been amended to more clearly define the invention by providing for arranging with a selected number of the second parties to acquire, compile and store in a database, information regarding the adoption, implementation and observation of security measures for each of the selected number of second parties. Independent claim 8 similarly has been amended to provide for providing an assessment of security procedures adopted, implemented and observed for each of the plurality of vendors. It is submitted that none of the references of record either disclose or teach the method recited in such claims, particularly as has been more clearly defined. Reconsideration of the rejection of such claims respectfully is requested in view of such amendments and the following remarks.

The method disclosed and taught in the Lawrence published application essentially consists of gathering data relevant to government regulations; aggregating the data gathered according to risk variables which include such items as a sovereign state involved, a geographic area involved, a shell bank, a correspondent account, a political figure involved, a person close to a political figure, a history of fraud, sanctions and similar items; receiving from a client an inquiry to a risk subject which includes such items as a financial transaction or a party involved in a financial transaction; associating portions of the aggregated data with the risk subject, i.e., the financial transaction or a party involved in a financial transaction, and then transmitting the selected portion of the aggregated data to the client. Such method essentially involves an investigation of the credit worthiness or another type of qualification of a financial transaction, a party involved in a financial transaction or some other situation. It would appear to involve a party such as a bank making a credit check or some other form of check in determining whether

to place a loan, make some other form of financial commitment or make some other form of commitment with respect to a particular financial transaction, a person seeking some type of financing or some other situation. It does not relate and has nothing to do with determining whether a prospective vendor to whom a client may be entertaining outsourcing certain work involving confidential information, is qualified under government regulation to handle such confidential information.

In contrast to the method disclosed and taught by Lawrence, the present invention involves arranging with a selected number of second parties such as vendors to acquire, compile and store in a database, information regarding the adoption, implementation and observation of security measures for each of the selected number of second parties or vendors; arranging with a selected number of the first parties which could consists any form of entity interested in outsourcing work to vendors involving the disclosure of confidential information such as financial institutions, health organizations, defense contractors and the like, subscription services providing the selected number of first parties or clients with a assurances of the adoption, implementation and observation of such security measures of the selected number of prospective vendors, upon request; and providing the assurances of the security measures of the selected number of second parties or vendors to the selected number of first parties or clients. Such method does not involve a client seeking information to determine the credit worthiness of a financial transaction or a person involved in a financial transaction or a comparable transaction or person but a client interested in outsourcing work involving confidential information to a prospective vendor and seeking assurances that such prospective vendor has complied with governmental regulations regarding the safeguarding of confidential information.

Attorney Docket No. PNL21348

The claimed method further involves arranging with a selected number of second parties,

i.e., vendors, to acquire, compile and store in a database, information regarding the adoption,

implementation and observation of security members by such second parties or vendors. No

such feature is included in the method disclosed or taught by Lawrence. The method described

in Lawrence merely provides for aggregating information globally from different sources and not

from prospective vendors of clients as provided in the claimed method.

Claims 8 through 17 further provide for making an assessment of the security procedures

adopted, implemented and observed by each of the vendors, storing such assessments in a

database and providing access of such assessments to clients.

In view of the foregoing, it respectfully is requested that rejection of Applicants claims be

withdrawn, such claims be allowed and further that the application be passed to issue. The

Commissioner is hereby authorized to charge any underpayment of fees or credit any

overpayment of fees in connection with this communication to Deposit Account 19-4375.

Respectfully submitted,

Peter N. Lalos

Registration No. 19,789

STEVENS, DAVIS, MILLER & MOSHER, LLP

1615 L Street, N.W., Suite 850

Washington, D.C. 20036-5622

March 26, 2007

PNL:cb 202/785-0100

7